

MODIFICATION REQUEST COVER SHEET

Name of Filer	CAROLINA SUN-WIDROW
Reporting Period	<input checked="" type="checkbox"/> Annual report – calendar year 2019 <input checked="" type="checkbox"/> Appointee report (Sept 2018 - Sept 2019)
Type of Request	<input checked="" type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input type="checkbox"/> Full Commission Approval <input type="checkbox"/> Renewal with Change
Office Held/Sought & Term	State Board Commissioner/Member Pollution Control Hearings Board and Shorelines Hearings Board Appointment began September 2019 Term expires June 30, 2024
Application Rule(s)	<input checked="" type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(1)(b) <input type="checkbox"/> Personal Residence: WAC 390-28-100(1)(d) <input type="checkbox"/> Attorney: WAC 390-28-100(1)(e)(i) <input type="checkbox"/> Judge / Judicial Candidate: WAC 390-28-100(1)(e)(ii) <input checked="" type="checkbox"/> Spousal: WAC 390-28-100(1)(e)(iv) <input type="checkbox"/> Other: WAC 390-28-100 (1)(e)
Explanation of Rule(s)	<p>Income and ownership interests. An applicant may be exempted from reporting the information otherwise required by RCW 42.17A.710 (1)(f) and (g), if:</p> <ul style="list-style-type: none"> (i) Public disclosure would violate any legally recognized confidential relationship that serves a legitimate business interest; (ii) The information does not relate to a business entity which would be subject to the regulatory authority of the office sought or held by the applicant in whole or in part; (iii) Such reporting would present a manifestly unreasonable hardship to the applicant including, but not limited to, adversely affecting the competitive position of an entity in which the applicant had an interest of ten percent or more as described in RCW 42.17A.120; and (iv) The interest in question would present no actual or potential conflict with the performance of the duties of the office sought or held. <p>Applicants whose spouse or registered domestic partner creates a reporting obligation for the applicant. When an applicant is required to report the activities of an entity solely because the applicant's spouse or registered domestic partner held an office, directorship, general partnership or ownership interest in the entity and the applicant does not have direct knowledge of the information that must be reported, the</p>

	<p>applicant may be allowed to satisfy the disclosure requirements of RCW 42.17A.710 (1)(g)(ii) and WAC 390-24-020 by disclosing reportable customers from whom compensation in excess of the disclosure threshold established under RCW 42.17A.710 (1)(g)(ii) has been received as follows:</p> <p>(A) All payments made by the agency or jurisdiction in which the applicant seeks or holds office to the entity;</p> <p>(B) The business and other governmental customers or clients of the applicant's spouse/domestic partner and of the entity of which the applicant is aware; and</p> <p>(C) Any other business and other governmental customers or clients of the entity whose identities are known to the applicant and whose interests are significantly affected by the agency or jurisdiction in which the applicant seeks or holds office. The commission may apply (e)(i) through (iii) of this subsection when the applicant's spouse/domestic partner is a lawyer, judge, or motor vehicle dealer.</p>
<p>Supporting Documents (attached)</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Current F-1 (filed March 11, 2020) <input checked="" type="checkbox"/> Modification Request Application (April 8, 2020) <input checked="" type="checkbox"/> Email, dated April 8, 2020 <input checked="" type="checkbox"/> Email, dated April 29, 2020 <input checked="" type="checkbox"/> F-1 (filed September 19, 2019) <input checked="" type="checkbox"/> Modification Request Application (September 19, 2019)
<p>Reason(s) for Modification (as stated by filer)</p>	<ul style="list-style-type: none"> • Ms. Sun-Widrow is requesting a reporting modification that would exempt her from disclosing the business and governmental customers that paid \$12,000 or more to Olympia Internal Medicine Associates, LLC, her spouse's medical practice, from the date of her appointment (9/19/2018) through the end of calendar year 2019. • Ms. Sun-Widrow is also requesting a reporting modification that would exempt her from disclosing the business and governmental customers that paid \$12,000 or more for the same time period to Community Youth Services, where she formerly served as a board member. • Ms. Sun-Widrow was appointed to the position of State Board Commissioner for the Pollution Control and Shorelines Hearings Boards on September 18, 2019. She indicates her duties are similar to that of a judge and include hearing and deciding appeals from state agencies and local government concerning environmental law.

Olympia Internal Medicine Associates, LLC

- Ms. Sun-Widrow stated that Olympia Internal Medicine Associates, LLC is a medical practice in which her spouse, Robert Widrow, has 49% ownership interest.
- Ms. Sun-Widrow indicated she does not have reportable ownership interest in Olympia Internal Medicine Associates, LLC.
- Ms. Sun-Widrow stated that the medical practice serves over 3,000 patients and is staffed by two physicians and the equivalent of 7 full-time employees.
- Ms. Sun-Widrow confirmed that the Pollution Control and Shorelines Hearings Boards did not make any reportable payments to Olympia Internal Medicine Associates, LLC during the reporting periods 9/19/2018 - 12/31/2019 (see attached).
- Ms. Sun-Widrow stated she does not know how many reportable business or governmental customers have paid Olympia Internal Medicine Associates, LLC more than \$12,000 during 9/19/2018 - 12/31/2019 because she has no personal knowledge of the medical practice's clients, does not have access to its confidential data, and the information is not available from public sources. She is also concerned that such a list could violate patient confidentiality.

Community Youth Services

- Ms. Sun-Widrow stated she resigned from her board member position with non-profit organization Community Youth Services in November of 2018.
- Ms. Sun-Widrow indicated she did not have reportable ownership interest in Community Youth Services and was not involved in its day-to-day operations.
- Ms. Sun-Widrow stated Community Youth Services is a social services non-profit with over 100 employees and annual budget of approx. \$8,000,000. Community Youth Services helps foster children, at-risk youth and their families with therapy, case management, shelter, employment and educational needs.

	<ul style="list-style-type: none">• Ms. Sun-Widrow confirmed that the Pollution Control and Shorelines Hearings Boards did not make any reportable payments to Community Youth Services during the reporting periods 9/19/2018 - 12/31/2019 (see attached).• Ms. Sun-Widrow states she does not know how many reportable business or governmental customers have paid Community Youth Services more than \$12,000 during 9/19/18 - 12/31/2019 because she resigned from its board in 2018, does not have access to its customer list, and believes a client list is not available from public sources. She is also concerned that such a list may violate confidentiality laws.
Other Issues	<p>Ms. Sun-Widrow has agreed to recuse herself if a matter comes before the Pollution Control and Shorelines Hearings Boards involving a conflict of interest between her personal interests and public duties.</p> <p>At the time of her appointment as a State Board Commissioner in September of 2019, Ms. Sun-Widrow submitted an F-1 reporting modification request for the previous 12 months that was not processed. Upon discovering this oversight, PDC staff consolidated her requests so this is a retroactive modification that covers both reporting periods.</p>